



**U.S. Department of Justice**

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June 20, 2024

The Honorable Stephanie A. Gallagher  
United States District Judge  
U.S. Courthouse  
101 W. Lombard Street  
Baltimore, Maryland 21201

Re: United States v. Rodney Gaines et al.  
Crim. No. SAG-22-0125

Dear Judge Gallagher:

The government writes in advance of tomorrow's motions hearing to provide an inventory of the pending motions, status, and the evidence or argument the government anticipates presenting. Much of the information about the pending motions is based on the "summary" table document the government prepared in April 2024. This proposal takes into consideration that counsel for Defendant Hill will be attending the afternoon session.

Of course, the government will address any other questions or concerns the Court may have.

**Morning session**

Based on counsel availability we would suggest that the following motions be addressed during the morning session (time allowing):

Motions involving testimony: The government anticipates presenting witness testimony on the following motions:

Tonya Hatchett	
ECF 375	<p>ECF 375 - Motion to suppress search of storage unit (third party consent issue) (government anticipates presenting testimony of Maryland State Trooper First Class Tredia Howell and possibly also MSP Master Trooper Jason Stevens).</p> <p>ECF 375 also challenges the search warrants executed at two locations, Ardenne Way and Mill Run Circle. Argument on</p>

	those matters will be based on the search warrant papers and standing.
ECF 373	Motion to suppress statements (government anticipates presenting testimony from Special Agent Jasmine Lewis, who will also testify about the Gaines statement).
<b>Rodney Gaines</b>	
ECF 379	ECF 379 – Motion to suppress statements (government anticipates presenting testimony from Special Agent Jasmine Lewis).

Motions involving legal argument: We believe the following motions can be resolved based on legal argument and the record set forth in briefing papers:

<b>Rodney Gaines</b>	
ECF 473	Motion to dismiss under the Speedy Trial Act.
<b>Tonya Hatchett</b>	
ECF 376	Hatchett's motion to suppress Title III interception evidence (specifically, December 2, 2021 order authorizing interception of Rodney Gaines's phone, on which Hatchett was intercepted per motion). <b>Gaines, Mills</b> adopting (attorneys Burnham and Walsh-Little)
ECF 374	Hatchett's motion for severance from co-defendants. <b>Gaines, Mills</b> adopting (attorneys Burnham and Walsh-Little)
<b>Andre Mills</b>	
ECF 363	Mills's Motion <i>in limine</i> to preclude government from using evidence of Defendant's conduct and statements at his home. The government does not anticipate presenting witness testimony on this issue. The events at issue were captured on police body-worn camera. The government has provided a copy to the Court and will be prepared to play the video, if the Court wishes, during the hearing tomorrow.

**Afternoon Session:** During the afternoon session we propose to finish whatever motions are unresolved from the morning session, and then to address motions for Defendant Hill, listed below. The government does not believe that any of Defendant Hills's motions involve the taking of evidence:

<b>Deandre Hill</b>	
ECF 369	Hill's motion in miscellaneous pretrial issues, including for Fed. R. Crim. P. 12(b)(4)(B) designation, early disclosure of Jencks Act material, and leave to file additional motions.
ECF 370	Hill's motion to disclose identities of confidential informants.

We are available of the Court has any questions. Thank you.

Very truly yours,

Erek L. Barron  
United States Attorney

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LaRai N. Everett  
Michael C. Hanlon  
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cc: All counsel via ECF